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Attorneys for Defendants
CHIPOTLE MEXICAN GRILL, INC.
& CHIPOTLE SERVICES, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RAMIRO MORAN VALENCIA, Plaintiffs, v. CHIPOTLE MEXICAN GRILL, INC; and CHIPOTLE SERVICES, LLC; et al., Defendants.	Case No. 3:14-cv-05537-JST **OFFER OF JUDGMENT OF DEFENDANTS CHIPOTLE MEXICAN GRILL, INC. AND CHIPOTLE SERVICES, LLC TO PLAINTIFF RAMIRO MORAN VALENCIA** Judge: Hon. John S. Tigar Complaint Filed: December 18, 2014 Trial Date: May 16, 2016

TO PLAINTIFF RAMIRO MORAN VALENCIA AND HIS ATTORNEYS OF RECORD:

Pursuant to Federal Rule of Civil Procedure 68, defendants Chipotle Mexican Grill, Inc. and Chipotle Services, LLC, by and through their counsel of record, hereby offer to allow judgment to be taken against them and in favor of plaintiff Ramiro

Moran Valencia in the amount of Twenty-Five Thousand and 00/100 Dollars ($25,000.00), inclusive of all costs, attorneys' fees and interest accrued to date.

This is offer does not constitute, and shall not be construed as, an admission of any kind whatsoever.

Dated: June 24, 2015

MESSNER REEVES, LLP

By: ______________________
Charles C. Cavanagh
Eric De Wames
Attorneys for Defendants
CHIPOTLE MEXICAN GRILL, INC.
& CHIPOTLE SERVICES, LLC

PROOF OF SERVICE

I am employed by the law firm of Messner Reeves LLP, in Denver, Colorado. I am over the age of eighteen and not a party to the within action. My business address is 1430 Wynkoop Street, Suite 300, Denver, Colorado 80202.

On June 24, 2015, I served the foregoing document described as: Defendants Offer of Judgment to Plaintiff, on all interested parties in this action as stated below:

NEVILLE FERNANDES
NORCAL EMPLOYMENT COUNSEL
548 Market Street, Suite 22582
San Francisco, CA 94104

[XX] **BY MAIL** [CCP §1013(a)] By placing [XX] the original [] a true copy thereof enclosed in a sealed envelope(s) addressed as to the above-named counsel of record or parties in propria persona. I caused such envelope postage thereon fully prepaid to be placed in the United States mail at Denver, Colorado. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Denver, Colorado in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[ ] BY PERSONAL DELIVERY [CCP §1011(a)] By placing [ ] the original [ ] a true copy thereof enclosed in a sealed envelope(s) addressed as to the above-named counsel of record or parties in propria persona. I caused such envelope to be delivered to the office of the addressee.

[] BY OVERNIGHT DELIVERY [CCP §1013(a)] By placing [ ] the original [ ] a true copy thereof enclosed in a sealed envelope(s) addressed as to the above-named counsel of record or parties in propria persona. I caused such envelope to be deposited in the Federal Express box at 1430 Wynkoop Street, Suite 300, Denver, Colorado, 80202, which is regularly maintained by Federal Express, with delivery fees pre-paid and provided for, addressed to the person on whom said document is to be served.

[] BY FACSIMILE OR EMAIL TRANSMISSION [CCP §§1013(e) 1010.6(a)(6)]. Based upon an agreement of the parties to accept service by facsimile transmission or email, I caused said document, along with an unsigned copy of this Declaration to be transmitted to a facsimile machine telephone number or email address as last given by said counsel or party in propria persona as noted above. No error was reported by the fax machine or email program and a true and correct copy of the facsimile confirmation or email transmission sheet is attached to the original of this Proof of Service.

I declare under penalty of perjury under the laws of the State of Colorado that the forgoing is true and correct.

Dated: June 24, 2015

Kim Downes